

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**CHASE BORDEN,**

**Plaintiff,**

**vs.**

**LIBERTY INSURANCE  
CORPORATION,**

**Defendant.**

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**CIVIL ACTION NO.: 4:17-cv-00180**

**JOINT MOTION TO DISMISS WITH PREJUDICE**

Plaintiff Chase Borden and Liberty Insurance Corporation file this Joint Motion to Dismiss with prejudice, and in support thereof would respectfully show the Court as follows:

All matters between the Parties have been fully settled. Accordingly, the Parties now request that this matter, including all claims that have been and/or could have been asserted in this matter, be dismissed with prejudice to the re-filing of same.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Chase Borden and Defendant Liberty Insurance Corporation request that the above-styled and numbered case be dismissed with prejudice to the re-filing of same, with costs of Court to be taxed against the party incurring same.

Respectfully Submitted,

/s/ Richard D. Daly

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**ATTORNEYS FOR PLAINTIFF  
CHASE BORDEN**

/s/ Colin Batchelor

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**ATTORNEYS FOR DEFENDANT  
LIBERTY INSURANCE CORPORATION**

<b>CERTIFICATE OF SERVICE</b>
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In accordance with the FEDERAL RULES OF CIVIL PROCEDURE, I hereby certify that on the 20th day of December, 2017, a true and correct copy of the above and foregoing instrument was served *via facsimile or electronic service* upon:

**ATTORNEYS FOR PLAINTIFF**

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/s/ Colin Batchelor  
COLIN BATCHELOR